

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Angel Hughes)
Debtor) Case No: 17 B 11836
) Judge: Doyle
) Chapter 13
)

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

Trustee: Tom Vaughn, 55 E. Monroe Street, Ste. 3850, Chicago, IL 60603

and served upon the following parties via U.S. Mail:

Debtor: Angel Hughes, 37 N. Latrobe Ave., Chicago, IL 60644

See Attached Service List

PLEASE TAKE NOTICE that on February 27, 2018 at 10:00 a.m.,

or as soon thereafter as I may be heard, I shall appear before the Honorable Judge

Doyle, or any other Bankruptcy Judge presiding in her place in Courtroom 742 of the Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion to Modify Plan, and shall request that the attached Order be entered, at which time you may appear if so desired.

PROOF OF SERVICE

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before 6:00 p.m. on or before February 6, 2018.

/s/ Michelle K. Hinds
Michelle K. Hinds
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001

0752-1

Case 17-11836

Northern District of Illinois

Chicago

Tue Feb 6 11:26:43 CST 2018

Brandon S. Lefkowitz

24100 Southfield Road

Suite 203

Southfield, MI 48075-2851

Capital One

Attn: General Correspondence/Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

City of Chicago Department of Finance

c/o Arnold Scott Harris

111 W Jackson Blvd Ste 600

Chicago, IL 60604-3517

City of Chicago Parking

Dept of Revenue

PO Box 88292

Chicago, IL 60680-1292

Comenity Bank/Lane Bryant

Attn: Bankruptcy

Po Box 182125

Columbus, OH 43218-2125

Fed Loan Sevicing

Po Box 69184

Harrisburg, PA 17106-9184

First Premier Bank

601 S Minneapolis Ave

Sioux Falls, SD 57104

PLS Loan Store

1617 N. Cicero

Chicago, IL 60639-4519

PRESTIGE FINANCIAL SERVICES

PO BOX 26707

SALT LAKE CITY, UT 84126-0707

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

Premier Bankcard, LLC

Jefferson Capital Systems, LLC Assignee

PO BOX 7999

SAINT CLOUD MN 56302-7999

(p)PRESTIGE FINANCIAL SERVICES

PO BOX 26707

SALT LAKE UT 84126-0707

Regional Acceptance Co

304 Kellm Road

Virginia Beach, VA 23462-2712

Synchrony Bank/ Old Navy

Attn: Bankruptcy

Po Box 956060

Orlando, FL 32896-0001

The Payday Loan Store

c/o Creditors Bankruptcy Service

P O Box 800849

Dallas, TX 75380-0849

U.S. Department of Education

c/o FedLoan Servicing

P.O. Box 69184

Harrisburg, PA 17106-9184

US Dept of Education

Attn: Bankruptcy

Po Box 16448

Saint Paul, MN 55116-0448

Angel M. Hughes

37 N Latrobe Ave

Chicago, IL 60644-3333

Jason Blust

Law Office of Jason Blust, LLC

211 W. Wacker Drive

Ste. 300

Chicago, IL 60606-1390

Patrick S Layng

Office of the U.S. Trustee, Region 11

219 S Dearborn St

Room 873

Chicago, IL 60604-2027

Tom Vaughn

55 E. Monroe Street, Suite 3850

Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Portfolio Recovery Associates, LLC

Successor to CAPITAL ONE BANK (USA) N.A.

(CAPITAL ONE BANK, N.A.)

POB 41067

Norfolk, VA 23541

Prestige Financial Services

Attn: Bankruptcy

1420 South 500 West

Salt Lake City, UT 84115

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Americash Loans
PO Box 184
Des Plaines, IL 60016-0003

	End of Label Matrix
Mailable recipients	23
Bypassed recipients	1
Total	24

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Debtor)

MOTION TO MODIFY PLAN

Now comes Angel Hughes (hereinafter referred to as "Debtor"), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On April 14, 2017 the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2. This Honorable Court confirmed the Debtor's Chapter 13 plan on June 20, 2017. The confirmed plan called for monthly payments of \$400.00 for 60 months, paying unsecured creditors a minimum of 10% on their claims.

3. The Debtor fell behind on plan payments because she moved in September, 2017 and had to pay \$1,000.00 toward a security deposit and moving expenses.

4. The Debtor is now caught up on her bills after moving and believes she can afford an increased plan payment of \$430.00 if her current default is deferred to the end of the plan (see attached Amended Schedules I and J, referred to as "Exhibit").

5. If the Debtor's plan payment is increased to \$430.00 and her default is deferred, the unsecured creditors will still receive 10% on their claims, and the plan will complete within 60 months.

WHEREFORE, Debtor prays that this Honorable Court enter an Order:

1. Increasing her plan payment to \$430.00;
2. Deferring her current plan payment default; and
3. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

/s/ Michelle K. Hinds
Michelle K. Hinds
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001